August 9, 2002



### By Overnight Courier

Lynda L. Dorr, Secretary
Office of the Secretary
Public Service Commission of Wisconsin
Public Service Commission Building
610 N. Whitney Way
Madison, Wisconsin 53705

Re: Petition for Relief of the 715 Area Code

Dear Ms. Dorr:

Enclosed for filing are an original and 20 copies of the petition of NeuStar, Inc., in its role as the North American Numbering Plan Administrator and on behalf of the Wisconsin telecommunications industry, requesting approval of a relief plan for the 715 area code. Please date-stamp the enclosed return copy as received and return it in the enclosed self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Timberly Miller
Kimberly Wheeler Miller

Director, Regulatory Law and Public Policy

NeuStar, Inc.

### ORIGINAL

### Before the PUBLIC SERVICE COMMISSION OF WISCONSIN Madison, Wisconsin 53707-7854

NANPA, on behalf of the Wisconsin Telecommunications Industry, Petition for Approval of NPA Relief Plan	) ) ) Dock	et No.		
for the 715 NPA	)		<b>7.7</b>	

### PETITION OF THE NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR ON BEHALF OF THE WISCONSIN TELECOMMUNICATIONS INDUSTRY

NeuStar, Inc., the North American Numbering Plan Administrator ("NANPA"), in its role as the neutral third party NPA Relief Planner for Wisconsin under the North American Numbering Plan and on behalf of the Wisconsin telecommunications Industry ("Industry"), <sup>1</sup> petitions the Public Service Commission of Wisconsin ("Commission")<sup>2</sup> to approve the Industry's consensus decision to recommend to the Commission an all-services distributed overlay as its first choice for relief for the 715 numbering plan area ("NPA"). <sup>3</sup> Should the Commission reject an all-services overlay relief plan, the Industry recommends, via the consensus process, that the Commission approve a north to south geographic split approximately

<sup>&</sup>lt;sup>1</sup> The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 715 area code of Wisconsin.

<sup>&</sup>lt;sup>2</sup> The Federal Communications Commission ("FCC") delegated authority to review and approve NPA relief plans to the states. *See* 47 C.F.R. § 52.19.

<sup>&</sup>lt;sup>3</sup> As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

through the midsection of the 715 NPA as the least disruptive split alternative. The Industry submits its recommendations to the Commission based upon NANPA's projections that absent NPA relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) for the 715 NPA will exhaust during the second quarter of 2005. In order to allow sufficient time for completion of the selected relief plan prior to exhaust of CO codes in the 715 NPA, and if the Commission adopts the Industry's overlay relief plan, the Industry recommends that the Commission approve its nineteen month implementation schedule. In support of this petition and on behalf of the Industry, NANPA submits the following:

### I. BACKGROUND

The 2001 NRUF (Number Resource Utilization Forecast) and NPA Exhaust Analysis

June 1, 2001 Update indicated that the 715 NPA will exhaust during the second quarter of 2005.<sup>5</sup>

Due to the projected exhaust, NANPA notified the Commission and the Industry on April 9,

2002 that NPA relief needed to be addressed. The Industry met on June 4, 2002, via conference call, to discuss various relief alternatives.<sup>6</sup> Pursuant to the NPA Relief Planning Guidelines,

NANPA distributed an Initial Planning Document ("IPD") to the Industry prior to the relief

<sup>&</sup>lt;sup>4</sup> In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, Nov. 13, 2000) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry and Regulatory Authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <a href="http://www.atis.org/atis/clc/inc/incdocs.htm">http://www.atis.org/atis/clc/inc/incdocs.htm</a>.

<sup>&</sup>lt;sup>5</sup> 2001 NRUF and NPA Exhaust Analysis June 1, 2001 Update. Following the June 4 meeting, NANPA released the 2002 NRUF and NPA Exhaust Analysis, June 5, 2002 ("2002 NRUF Report"). The 2002 NRUF Report lists the same projected exhaust for the 715 NPA – second quarter 2005. The 2002 NRUF Report can be accessed on the NANPA web site at http://www.nanpa.com.

<sup>&</sup>lt;sup>6</sup> A copy of the June 4 meeting minutes, including a list of attendees, is attached as Exhibit A.

planning meeting.<sup>7</sup> The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of one all-services distributed overlay relief alternative and five geographic split alternatives, two of which were developed by the Industry prior to the June 4 meeting.

More specifically, the Industry participants considered the following alternatives:

- Alternative #1 All-Services Distributed Overlay: A new NPA code would be assigned to the same geographic area as the existing 715 NPA. Alternative #1 has a projected life of 12 years.
- Alternative #2 Geographic Split: The proposed split boundary line runs along rate center boundaries in a north to south direction and approximates the LATA boundaries between LATA 352 and LATA 350. The proposed boundary runs west of Mercer, Brantwood, Medford, Greenwood and Pittsville and creates two new NPA areas. The western area is referred to as "Area A" and the eastern area is referred to as "Area B." Area A has a projected NPA life of 9 years to exhaust and Area B has a projected NPA life of 17 years to exhaust.
- Alternative #3 Geographic Split: The proposed split boundary line runs along rate center boundaries in a west to east direction south of the Danbury, Spooner and Winter rate centers. The line then turns south and runs west of the Kennan, Medford, Owen, Greenwood, and Pittsville rate centers and creates two new NPA areas. The smaller, southwestern area is referred to as "Area B" and the remainder is referred to as "Area A." Area A has a projected NPA life of 10 years to exhaust and Area B has a projected NPA life of 16 years to exhaust.
- Alternative #4 The proposed split boundary line runs along rate center boundaries in a west to east direction south of the Star Prairie, Clear Lake, New Auburn, Eagle Point, and

<sup>&</sup>lt;sup>7</sup> A copy of the IPD is attached as Attachment 3 to Exhibit A.

Stetsonsville rate centers. The line then turns south and runs west of the Edgar, Mosinee, Elderon and Waupaca rate centers and creates two new NPA areas. The smaller, southwestern area is referred to as "Area B" and the remainder is referred to as "Area A." Area A has a projected NPA life of 10 years to exhaust and Area B has a projected NPA life of 16 years to exhaust.

- Alternative #5 Geographic Split: The proposed split boundary line runs along rate center boundaries in a west to east direction south of the Star Prairie, Clear Lake, Mosinee, and Marion rate centers and creates two new NPA areas. The smaller, southern area is referred to as "Area B" and the remainder is referred to as "Area A." Area A has a projected NPA life of 11 years to exhaust and Area B has a projected NPA life of 14 years to exhaust.
- Alternative #6 Geographic Split: The proposed split boundary line runs along rate center boundaries in a north to south direction west of Land of Lakes and curves north of Minocqua and Lac Du Flambeau and then turns south and runs west of Tomahawk and the north of Rib Lake. The proposed boundary creates two new NPA areas. The western area is referred to as "Area A" and the eastern portion is referred to as "Area B." Area A has a projected NPA life of 9 years to exhaust and Area B has a projected NPA life of 18 years to exhaust.

At the June 4 meeting, the participants discussed the attributes of the relief alternatives and reached consensus to recommend to the Commission Alternative #1, the all-services distributed overlay plan, as their first choice for relief for the 715 NPA.<sup>8</sup> As their second choice, the Industry participants reached consensus to recommend Alternative #6, a geographic split, should the Commission reject an all-services distributed overlay relief plan. The Industry stated

<sup>&</sup>lt;sup>8</sup> See Attachment 3 to Exhibit A for a list of Industry agreed upon attributes of geographic splits and overlays.

that Alternative #6 was the least disruptive split alternative. The Industry eliminated from consideration all the remaining split alternatives because the split lines divide several end office switch host-remote arrangements and therefore would place an undue burden on the service providers. Additionally, Alternative #5 adversely impacts certain existing dialing patterns and ECC calling plans and it separates communities of interest. Alternative #3 also adversely impacts existing dialing plans.

The Industry chose Alternative #1 as its first choice for relief because it would create a simple, uniform dialing plan throughout the 715 NPA, which would reduce customer confusion and would not affect small business and the tourism industry. The Industry chose Alternative #6 as its second choice for relief because it approximates existing LATA boundary lines and was the least disruptive of the geographic split plans.

### II. DESCRIPTION OF THE RECOMMENDED RELIEF PLANS

Alternative #1, the all-services distributed overlay, would superimpose a new NPA over the same geographic area covered by the existing 715 NPA. All existing customers would retain the 715 area code and would not have to change their telephone numbers. Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 715 NPA and the new NPA. Permissive 1+10-digit dialing will be available at the discretion of individual service providers. All toll calls, whether the calls are to the home NPA or a foreign NPA, will be dialed using 1+10 digits. All Extended Community Calling ("ECC") calls will be dialed on a 10-digit basis with permissive 1+10 digits available at the service provider's discretion. All operator-assisted calls will require customers to dial zero plus 10

<sup>&</sup>lt;sup>9</sup> 47 C.F.R. §52.19(c)(3)(ii).

digits. When the 715 NPA exhausts, all CO code assignments will be made from the new overlay area code. The projected life of Alternative #1 is 12 years.

Alternative 6, a geographic split, would split the 715 NPA into two NPAs with the dividing boundary separating the 715 NPA into an eastern and western half. A geographic split requires customers located within the area receiving the new area code to change their telephone numbers. All local calls within the home NPA, including Extended Area Service ("EAS") calls will continue to be dialed using seven-digit. At their discretion, service providers may provide permissive 1+10-digit dialing for such calls. The Industry recommends that all home toll calls require 1+10-digit dialing and that all calls terminating in a foreign NPA, whether local or toll, be dialed using 1+10-digit dialing. All operator-assisted calls will require customers to dial zero plus 10 digits. The projected lives of the two NPAs created by Alternative #6 are 9 and 18 years.

Industry participants reached consensus to recommend to the Commission a 19-month schedule for implementation of the overlay relief alternative. The schedule recommends a nine-month network preparation period and an additional nine-month permissive dialing period for purposes of educating customers on ten-digit dialing. Mandatory 10-digit dialing begins after the conclusion of the permissive dialing period. The first CO code in the new relief NPA will be activated one month after the conclusion of the permissive dialing period. The recommended schedule is dependent upon the Commission's adoption of an overlay as the means of relief for the 715 NPA. Adhering to the proposed timeframe will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

<sup>&</sup>lt;sup>10</sup> The activation date is the effective date for the CO codes assigned from the new NPA.

### III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 715 NPA in Wisconsin to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving either the Industry's first choice for relief for the 715 NPA, an all-services distributed overlay or the Industry's second choice, a two-way geographic split. The Industry also requests that the order approve the Industry-recommended 19-month schedule for the implementation of the overlay.

Respectfully submitted,

Kin berly Wheeler Mille

NeuStar, Inc.

North American Numbering Plan Administrator 1120 Vermont Avenue, N.W., Suite 400 Washington, D.C. 20005

(202) 533-2912

Frank Colaco
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North American Numbering Plan Administrator
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August 9, 2002

### EXHIBIT A

### 715 NPA - WISCONSIN RELIEF PLANNING MEETING MINUTES VIA CONFERENCE CALL JUNE 4, 2002

### WELCOME, INTRODUCTIONS & AGENDA REVIEW

Mr. Colaco, NeuStar NANPA Senior NPA Relief Planner opened the meeting with introductions, a review of the agenda, the objectives of the meeting and NANPA's roles and responsibilities. A list of attendees can be found in Attachment #1.

### REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Mr. Colaco stated that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process would be followed. He read the consensus process and explained how consensus is determined. In addition, Mr. Colaco stated that the minutes would be comprised of consensus items and issues that were not captured by consensus could be expressed in the form of a Statement for the Record (in writing) and they could be conveyed at any point during the meeting. The NPA Code Relief and Planning and Notification Guidelines were referenced and available for review. This document, as well as other relevant NPA assignment and relief guidelines. mav be downloaded from the ATIS web site (www.atis.org/atis/clc/inc/incdocs.htm).

Additionally, Mr. Colaco explained that the following guidelines would apply in determining consensus during a conference call meeting: NANPA will proceed with the conference call based on those who announced themselves at the start of the call. It is at that time that it will be determined whether enough companies, industry segments, etc. are on the call to warrant continuing. During the course of the meeting some participants may, for any reason, choose to drop off the call. Regardless, this will not influence the meeting proceeding according to the agenda. Silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. It will not be necessary to determine who is still on the call, when each consensus question is called. If it appears that consensus will be difficult to achieve on a given issue, or if an issue becomes controversial, NANPA may opt to poll the attendees to see who is still participating. Furthermore, at any time during the call, a participant may request a poll of the attendees.

#### STATUS OF WISCONSIN 715 NPA

Mr. Colaco reviewed the status of the 715 NPA, which reflects a total of 518 NXX codes currently assigned. As of May 28, 2002, 196 NXX codes remain available for assignment in the 715 NPA, while 86 additional NXX codes are classified as unavailable. Of these, 16 are "oddball" or special use codes, 62 are protected for 7-digit dialing, 4 are used for special use, e.g., time, weather, etc., 1 code is classified as "hold", and the remaining 3 codes are designated as test codes. The Year 2001 Number Resource Utilization Forecast (NRUF) projects exhaust of the 715 NPA during the 2<sup>nd</sup> quarter 2005. Mr. Colaco indicated that NANPA is in the process of

finalizing the 2002 NRUF exhaust forecast, and absent the implementation of pooling, the projected exhaust of the 715 NPA is estimated to remain the same.

The monthly NXX code assignments in the 715 NPA during the past seventeen months have been as follows:

	2001							2002								
JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY
5	4	1	3	0	12	3	5	2	2	2	20	5	2	3	1	5

The actual twelve-month average assignment rate since June 2001 to date is 5 codes per month, which is in excess of the 2001 NRUF projection of 3 codes per month.

### PRE-IPD CONFERENCE CALL RE-CAP

Mr. Colaco also provided a recap of the pre-IPD conference call held April 23, 2002, which included a review of the NANPA developed proposed relief alternatives. Informal meeting notes resulting from the industry conference were posted to NANPA's document distribution service on April 29, 2002.

### PROTECTED CODES

Mr. Colaco informed the industry group they should be aware of the 62 protected codes in the 715 NPA. These codes can't be used within the 715 NPA since they are in use in adjacent NPAs, and are protected from assignment to allow 7-digit dialing to those NPAs from the 715 NPA. The Industry Numbering Committee (INC) Guidelines recommend that protected codes be eliminated before NPA relief is implemented. The industry should investigate to see what could be done to reduce or eliminate them. Considering the annual demand for NNX Codes in the 715 NPA, this considerable amount of protected codes equates to approximately one years' worth of code growth. An industry member asked that NANPA provide the industry of a complete breakdown of the 62 protected codes. NANPA indicated that a list of these codes would be included with these minutes (See Attachment 2). The industry may decide on a later call what to do about these codes.

### REVIEW INITIAL PLANNING DOCUMENT (IPD) FOR THE 715 NPA

Mr. Colaco reviewed the Initial Planning Document (IPD) distributed prior to the meeting, which included an all services overlay (Alternative #1) and five 2-way geographic split alternatives (Alternatives #1 through #6). Alternatives #1 through 4 were developed by NANPA, while Alternatives #5 & #6 were submitted for consideration by industry members prior to this meeting. There were no additional alternatives proposed during the relief- planning meeting.

### DISCUSSION OF RELIEF ALTERNATIVES

General discussion ensued regarding the attributes of geographic splits and overlay alternatives. An industry participant asked if the projected lives included the protected codes. NANPA stated that since these codes were not available, they cannot be counted and would continue to be

protected. Another participant asked if any of the split lines could be moved or modified for additional alternatives. NANPA assured the attendees that anyone was free to propose additional relief alternatives for consideration during this meeting. Mr. Colaco queried the industry participants for additional proposed alternatives. There were no additional proposed alternatives.

### **INDUSTRY SEGMENTS IDENTIFIED:**

For purposes of determining consensus, NANPA stated after reviewing the attendee list, there were representatives from 7 wireless companies, 3 CLEC companies and 13 ILEC companies.

### CONSENSUS ON ELIMINATION OF RELIEF ALTERNATIVES

After discussion, a proposal was made, and consensus was reached to eliminate Alternatives # 2 and # 4 for the following reasons: These split alternatives split several end-office switch host-remote arrangements. This would put an undue burden on the service providers.

After discussion, a proposal was made, and consensus was reached to eliminate Alternative # 5 for the following reasons: This split alternative separates several switch host-remote arrangements and the host-remotes from the tandem arrangements for several service providers. This split alternative also impacts dialing patterns, separates communities of interest and impacts some ECC calling plans.

After discussion, a proposal was made, and consensus was reached to eliminate Alternative # 3 for the following reasons: This split separates certain dialing plans, separates the host-remote arrangements between the tandems in Rice Lake and Eau Claire. Additionally, it was noted by a participant that the two areas created by Alternative #3 seem to have disproportionate population levels between areas A & B.

### REACH CONSENSUS ON RELIEF ALTERNATIVE

After further discussion, a proposal was made, and consensus was reached to recommend Alternative # 1, the overlay, as the industry's first choice of relief, to the Wisconsin Public Service Commission. With the overlay the 10D dialing would eliminate a lot of confusion for the customers and standardize dialing in the NPA, avoid impacting the tourism industry, and small businesses.

It was further agreed that if the Wisconsin PSC rejects an overlay the industry recommends alternative # 6, a two-way geographic split, as the least disruptive alternative of the splits that were addressed. It was noted that NPA boundary line depicted in Alternative #6 approximates existing LATA boundaries.

### ESTABLISH IMPLEMENTATION SCHEDULE

A recommendation was made, and consensus was reached to recommend the following 19month implementation interval described below. It was noted that this proposed implementation schedule is applicable only to the overlay relief alternative

EVENT	TIMEFRAME
Total Interval	19 months
Network Preparation	9 months
Permissive 10-Digit Dialing and Customer Education Period	9 months
(Calls within 715 NPA can be dialed using 7 or 10 digits)	
First Code Activation	1 month (after Mandatory)
(Effective date for codes from the new NPA)	

### **REACH CONSENSUS ON DIALING PLAN (Alternative #1 – OVERLAY)**

A proposal was made, and consensus was reached to recommend the following dialing plan for the all-services overlay to the Wisconsin Public Service Commission:

- All home and foreign NPA local calls are dialed on a 10-digit basis, i.e., NPA-NXX-XXXX. Permissive 1+10 digit local dialing is available at the Service Providers option.
- All home and foreign NPA toll calls are dialed with a prefix "1" plus 10 digits, i.e., 1+NPA-NXX-XXXX.
- All Extended Community Calling (ECC) calls are dialed on a 10-digit basis or with a prefix "1" plus 10 digits, i.e., 1+NPA-NXX-XXXX, at the service providers discretion.
- All Operator Assisted calls, including credit card, collect and third party calls, are dialed with a prefix "0" plus 10 digits, i.e., 0+NPA-NXX-XXXX.

### SUGGESTED DIALING PLAN FOR AN NPA SPLIT (Alternative # 6 – Split)

A proposal was made and consensus reached to include as an attachment of the petition in case the PSC decides on a geographic split, the industry recommends the following dialing plan:

- All home NPA (HNPA) local calls, including Extended Area Service (EAS), will be dialed either on a 7-digit basis with no prefix i.e. NXX-XXXX (7 digits) or, optionally, with a prefix 1 and 10 digits (1+NPA-NXX-XXXX)
- All home NPA (HNPA) toll calls will be dialed with a prefix 1 and 10 digits (1+NPA-NXX-XXXX)
- All foreign (FNPA) calls, local and toll, terminating in NPAs other than the 715 NPA will be dialed with a prefix "1" and 10 digits i.e. 1+FNPA-NXX-XXXX (1+10 digits), or when the local exchange carrier elects to exercise the option of 10-digit dialing.
- All operator assisted calls, including credit card, collect and third party calls, will be dialed with a "0" prefix and 10 digits i.e. 0+NPA-NXX-XXXX (0+10 digits).

### REACH CONSENSUS for NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Consensus was reached that NANPA would file the results of the 715 NPA relief plan in a petition, on behalf of the industry, to the Wisconsin Public Service Commission following an industry conference call that will be held July 24, 2002 to review and approve the documentation.

### STATEMENTS FOR THE RECORD

There were no statements for the record from any of the participants.

### REVIEW OF DRAFT MEETING MINUTES & DRAFT COMMISSION FILING

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry by July 3, 2002. Consensus was also reached to conduct a conference call to review and approve these minutes as well as the draft filing to the Wisconsin Commission. Details of the call are as follows:

Date: Wednesday, July 24, 2002

Time: 1:00 p.m. Central (2:00 p.m. Eastern and 11:00 a.m. Pacific)

Dial-in Number: 847-619-6648

Pass code: 7880548#

During the conference call held July 24, 2002, to review and approve these meeting notes and the draft petition, consensus was reached that NANPA will file the petition with the Wisconsin Commission on Monday, August 12, 2002. Additionally, NANPA will post copies of the final meeting minutes and the filed petition on its Document Distribution Service (DDS) web site by August 12, 2002.

### ATTACHMENT 1 TO EXHIBIT A

## 715 NPA - WISCONSIN RELIEF PLANNING MEETING MINUTES VIA CONFERENCE CALL JUNE 4, 2002

### **PARTICIPANTS**

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Joyce Mahan	WI PSC	joyce.mahan@psc.state.wi.us

### ATTACHMENT 2 TO EXHIBIT A

### 715 NPA NXX CODES PROTECTED FOR 7-DIGIT DIALING

	- NXX
715	200
715	230
715	242
715	300
715	303
715	323
715 715	351
715	380
715	390
715	400
715	430
715	433
715	436
715	437
715	439
715	465
715	480
715	500
715	521
715	522
715	525
715	527
715	544
715	548
715	596
715	600
715	621
715	622
715	624
715	625
715	626

PROPERTY AND ADMINISTRA	Le son in the second
	NXX
715	628
715	655
715	691
715	705
715	721
715	722
715	724
715	725
715	727
, 715	728
715	729
715	733
715	734
715	740
715	753
715	786
715	788
715	800
715	809
715	840
715	863
715	867
715	888
715	897
715	900
715	932
715	935
715	982
715	989
715	991
715	998

## ATTACHMENT 3 TO EXHIBIT A

May 6, 2002

TO: 715 NPA (Wisconsin) Code Holders and Other Industry Members

RE: Industry Meeting to Plan Relief for the 715 Area Code

As stated in my memo dated April 9, 2002, the 715 area code in Wisconsin is projected to exhaust during the second quarter of 2005. Enclosed is the Initial Planning Document (IPD) for your review prior to the June 4, 2002 scheduled industry conference call meeting.

The IPD contains the projected life of several possible relief alternatives and the matching total codes at exhaust. If you wish to obtain a copy of the number of NXX codes currently assigned to each rate center and the projected growth in demand for NXX codes in the 715 NPA, please notify me. The primary objective of this meeting will be for the industry to review the alternatives included in the IPD and other industry proposed alternatives in order to hopefully reach consensus on a single relief plan to be presented to the Wisconsin Public Service Commission for their consideration. The format of the meeting will follow the consensus process (attached); NANPA will adhere to the process, developed in an open industry forum, under the auspices of Alliance for Telecommunications Industry Solutions (ATIS). Participants should have a copy of the "NPA Code Relief Planning and Notification Guidelines" INC 97-0404-016 readily available for reference during the conference call.

After the April 23, 2002 industry conference call to discuss the pre IPD, several support statements were submitted. I have included them for your information.

Because the impacts of NPA relief are so significant, NANPA strongly encourages your participation on June 4, 2002. Experience has demonstrated that this could be the only meeting of the industry before a decision is reached on a recommended plan. An agenda is attached. Changes to the agenda will be addressed at the start of the meeting and modified according the consensus of the meeting participants. Details regarding the meeting follow:

June 4, 2002 9:00 a.m. Central (10:00 a.m. Eastern and 7:00 a.m. Pacific) (847) 413-3193 plus pass code 7272114# If you plan to attend this meeting, please complete and return the enclosed Advance Meeting Reservation Form to me by May 21, 2002. You may also respond via email at <a href="mailto:pamela.kenworthy@neustar.biz">pamela.kenworthy@neustar.biz</a> with your intention to attend.

If you have anything that you would like to discuss before the industry meeting, please do hesitate to contact me at (973) 267-7812. You may also contact Frank Colaco, Sr. NPA Relief Planner, at (973) 740-9100 or by e-mail at <a href="mailto:frank.colaco@neustar.biz">frank.colaco@neustar.biz</a>. Thank you.

Pamela Kenworthy
Pamela Kenworthy
NPA Relief Planner

### WISCONSIN NPA RELIEF INITIAL PLANNING CONFERENCE CALL MEETING Tuesday, June 4, 2002

(all times are in the Central time zone)

### **CONFERENCE BRIDGE: (847) 413-3193 plus pass code 7272114#**

9:00	Welcome and Introductions
9:10	NANPA's Role and Responsibilities
9:15	Minutes and "Statements For The Record"
9:30	Industry Guidelines/Relief Attributes
9:45	Review Code Assignment History
10:00	Re-cap Pre IPD Conference Call
10:15	Review Initial Planning Document
11:15	Break
11:30	Additional Alternatives from Industry
12:00	Lunch
1:00	Elimination Of Alternatives
2:00	Consensus On Relief Alternative
2:10	Consensus on Dialing Plan
2:30	Consensus on Implementation Intervals
3:00	Statements for the Record
3:15	Consensus on NANPA Filing Industry Efforts With Commission
3:30	Set Date For Conference Call To Approve Meeting Notes
3:45	Complete NANPA Survey
4:00	Adjourn

### INDUSTRY CONSENSUS PROCESS

Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. Interest groups are those groups materially and differently affected by the outcome or result of the issue or question being called. Substantial agreement means more than a simple majority, but not necessarily unanimity. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection.

The consensus process is to free from interest group dominance, requiring that all views and objections be considered. This requires that a concerted effort be made toward issue resolution. Input from all participants will be considered carefully and in good faith in seeking and in reaching consensus recommendations and resolutions.

When there are questions or disputes regarding consensus, leaders or participants should ask objecting participant(s) to state the rationale for the objection. Opposition should not be assumed solely on an objecting participant's perceived interest group identity. Once the objecting participant(s) rationale is known and understood, other participants might then be swayed by the merits of the statement and the opportunity to reach a more clear path toward consensus may be achieved.

Therefore, the key factor in determining whether consensus is reached should be the rationale for how a question or issue directly and materially affects any given participant.

CLC Principles and Procedures Section 6.8.7

October 2000

Silence on the part of a participant when a resolution to an issue is proposed is considered to be agreement with the proposed resolution. Therefore, all participants are encouraged to articulate their concerns regarding proposed resolutions, and the leadership is expected to ensure that all participants are afforded an opportunity to voice their objections.

INC Administrative Guidelines Consensus Process

INC 95-0127-005 Reissued January 1998

# General NPA Relie Attributes

### Splits

# Overlays

# General Attributes of Splits

- Splits provide a single area code for each geographic area. This may minimize confusion for customers outside the area. Implementation is generally understood.
- Splits require an area code change for approximately one-half of customers in a two-way split, and two-thirds of customers in a three-way split.
- Geographic splits permit 7-digit dialing within an area code.
- Stationery, business cards and advertising containing a ten-digit phone number will need to be revised by customers receiving the new area code.
- Future splits will reduce the geographic size of the area code.

# General Attributes of Overlays

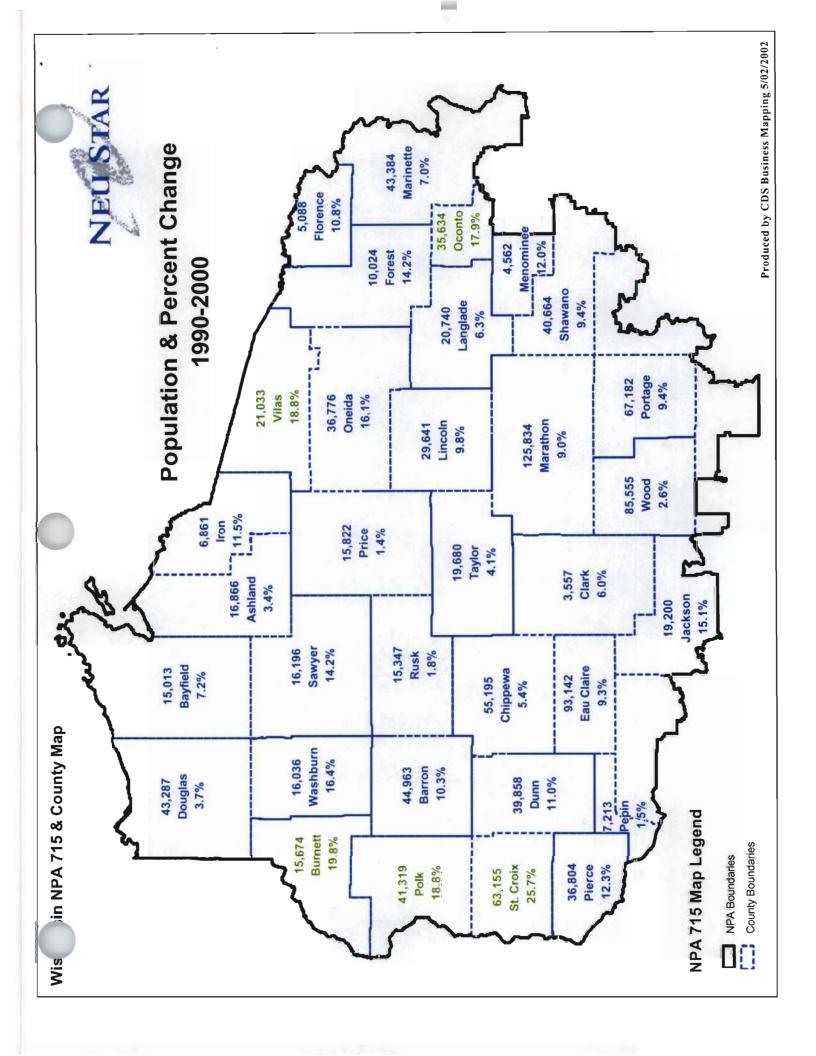
- With an overlay there will be more than one area code in a geographic area. Where the overlay is a new concept some customer education is desirable.
- An overlay will not require existing customers to change their area code.
- An overlay requires customers to dial 10 digits (or 1 + 10 digits) for all calls
- There is no need to revise stationery, business cards and advertising unless they contain only seven digit phone numbers.
- An overlay will end further shrinking of the geographic size of the area code because subsequent relief will likely be another overlay.

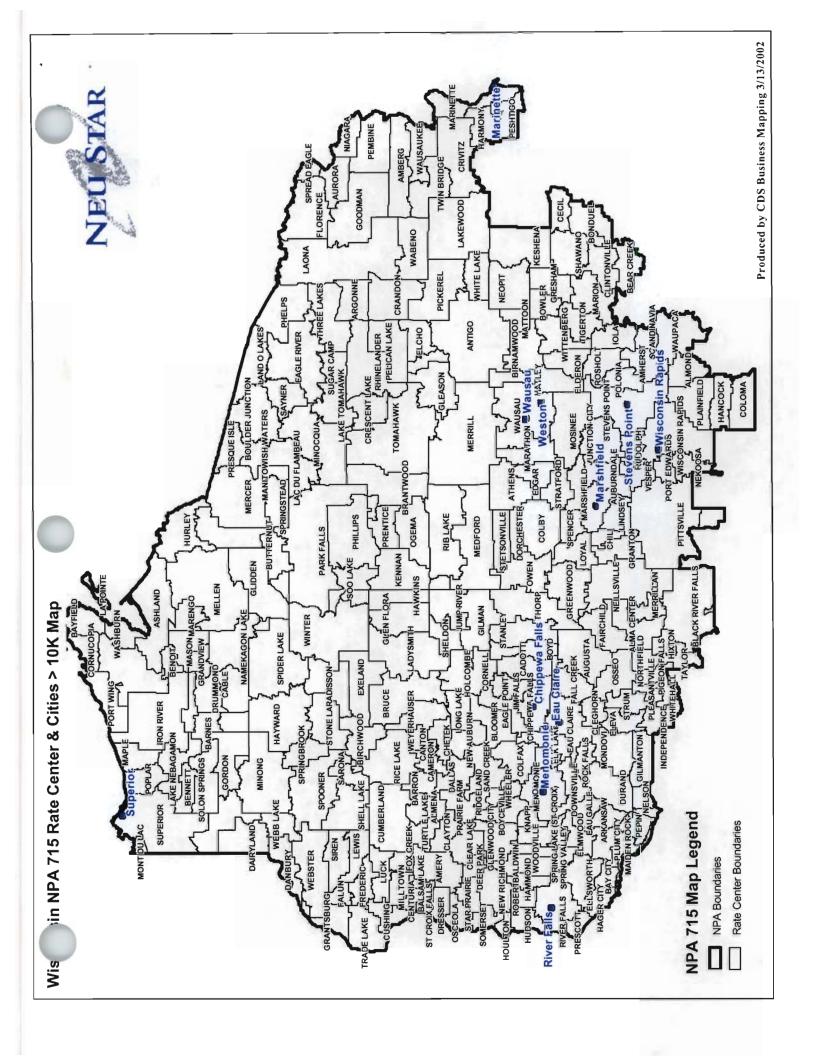
# General NPA Relie Alternative Attributes

# Overlays

# General Attributes of Concentrated Growth Overlays

- Special and unique monitoring methods, not currently available, are required for exhaust for the area outside of the concentrated overlay, and it is difficult to predict the exhaust of the area outside of the concentrated overlay area.
- Normally, no existing customers will be required to change their telephone number.
- Customer confusion pertaining to dialing for a concentrated overlay could exist.
- A concentrated growth overlay minimizes implementation of 10 digit dialing for customers.
- Customer confusion pertaining to dialing for a concentrated overlay could exist.
- In order to preserve codes, the NPA must be identified as needing relief and the relief plan needs to be approved much earlier in order to preserve enough codes to serve the non-concentrated overlay





### NPA 715 NXX Summary Data as of May 28, 2002

<u>NPA</u>	<u>715</u>			
Assigned NXXs	518			
Protected	62			
Reserved	4			
Hold	1			
Test NXXs	3			
Unavailable NXXs (see note)	16			
Available NXXs	196			
Total	800			
Codes assigned NPA 715	<u>Jan-01</u>	<u>Feb-01</u>	Mar-01	Apr-01
	5	4	1	3
	May-01	Jun-01	<u>Jul-01</u>	Aug-01
	0	12	3	5
	Sep-01	Oct-01	Nov-01	<u>Dec-01</u>
	2	2	2	20
	Jan-02	Feb-02	Mar-02	Apr-02
	5	2	3	<u>1</u>
	May-02	***************************************	and the section of th	outline de la Maria de La Caractería de La
	5			
	Service and the service of the servi			

Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950), codes set aside for pooling, and codes with special dialing arrangements (e.g., 7-digit dialing cross NPA boundary).

### **Initial Planning Document**

### For Relief of Wisconsin 715 NPA

### May 2001 NEP Projected Exhaust Date 2Q2005

North American Numbering Plan Administration

Pamela Kenworthy NPA Relief Planner

#### 715 NPA Relief Alternatives

### **WISCONSIN**

Numbering Plan Area 715 Born on Date: 1947

### NPA RELIEF PLANNING TOOL ASSUMPTIONS

NRUF DATE:

May 2001

PROJECTED EXHAUST DATE:

2<sup>nd</sup> Quarter 2005

ANNUALIZED CO CODE DEMAND PROJECTION:

59

MONTHLY CO CODE DEMAND PROJECTION:

3.0

LERG DATA:

March 2002

NATIONAL THOUSANDS BLOCK ROLLOUT

6<sup>th</sup> Quarter (6/15/03 –9/14/03)

### NPA Relief Alternatives

### Overlay Alternative

### Alternative #1 - All Services Distributed Overlay

A new NPA code would be assigned to the same geographic area as the existing 715 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers between and within area codes in the area covered by the new code would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 715 NPA all code assignment will be made in the overlay area code.

Total CO Codes at Exhaust = 718 Area code life in years = 12

### NPA Split Alternatives

The exhausting NPA is split into two geographic areas and a new NPA is assigned to one of the areas formed by the split. All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be permitted.

### Alternative #2 – NPA Split

The proposed boundary line runs along rate center boundaries approximately following the LATA boundaries between LATA 352 and LATA 350. The proposed boundary runs west of Mercer, Brantwood, Medford, Greenwood and Pittsville.

Area A

Area B

Total CO Codes at Exhaust = 409

Total CO Codes at Exhaust = 309

Area code life in years = 9

Area code life in years = 17

#### 715 NPA Relief Alternatives

### Alternative #3 – NPA Split

The proposed boundary line runs along rate center boundaries in a west/east direction south of the rate centers Danbury, Spooner and Winter. The line then turns south and runs west of the rate centers Kennan, Medford, Owen, Greenwood and Pittsville.

Area A Area B

Total CO Codes at Exhaust = 402 Total CO Codes at Exhaust = 316

Area code life in years = 10 Area code life in years = 16

### Alternative #4 - NPA Split

The proposed boundary line runs along rate center boundaries in a west/east direction south of the rate centers Star Prairie, Clear Lake, New Auburn, Eagle Point, Gilman, Medford, and Stetonsville. The line then turns south and runs west of the rate centers Edgar, Mosinee, Elderon, Iola and Waupac.

Area A Area B

Total CO Codes at Exhaust = 392 Total CO Codes at Exhaust = 326

Area code life in years = 10 Area code life in years = 16

### Industry Developed Alternatives

### Alternative #5 – NPA Split

The proposed boundary line runs along rate center boundaries in a west/east direction south of the rate centers Star Prairie, Clear Lake, New Auburn, Cornell, Gilman, Medford, Stetonsville, Edgar, Mosinee, Elderon and Marion.

Area A Area B

Total CO Codes at Exhaust = 378 Total CO Codes at Exhaust = 340

Area code life in years = 11 Area code life in years = 14

### Alternative #6 – NPA Split

The proposed boundary line runs along rate center boundaries in a north/south direction. The boundary line runs west of Land of Lakes and curves north of Minocqua and Lac Du Flambeau before turning south and running west of Tomahawk and then north of Rib Lake. The boundary line continues to run south west of Medford, Owen, Neillsville and Pittsville.

Area A Area B

Total CO Codes at Exhaust = 418 Total CO Codes at Exhaust = 300

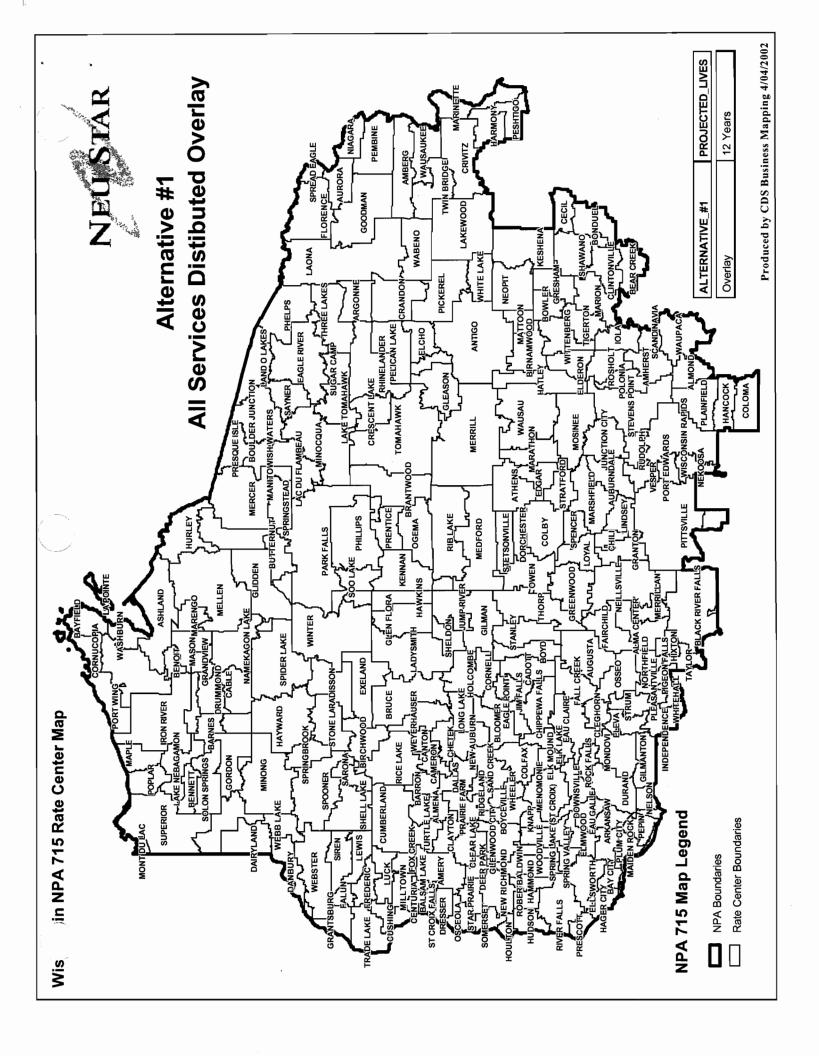
Area code life in years = 9 Area code life in years = 18

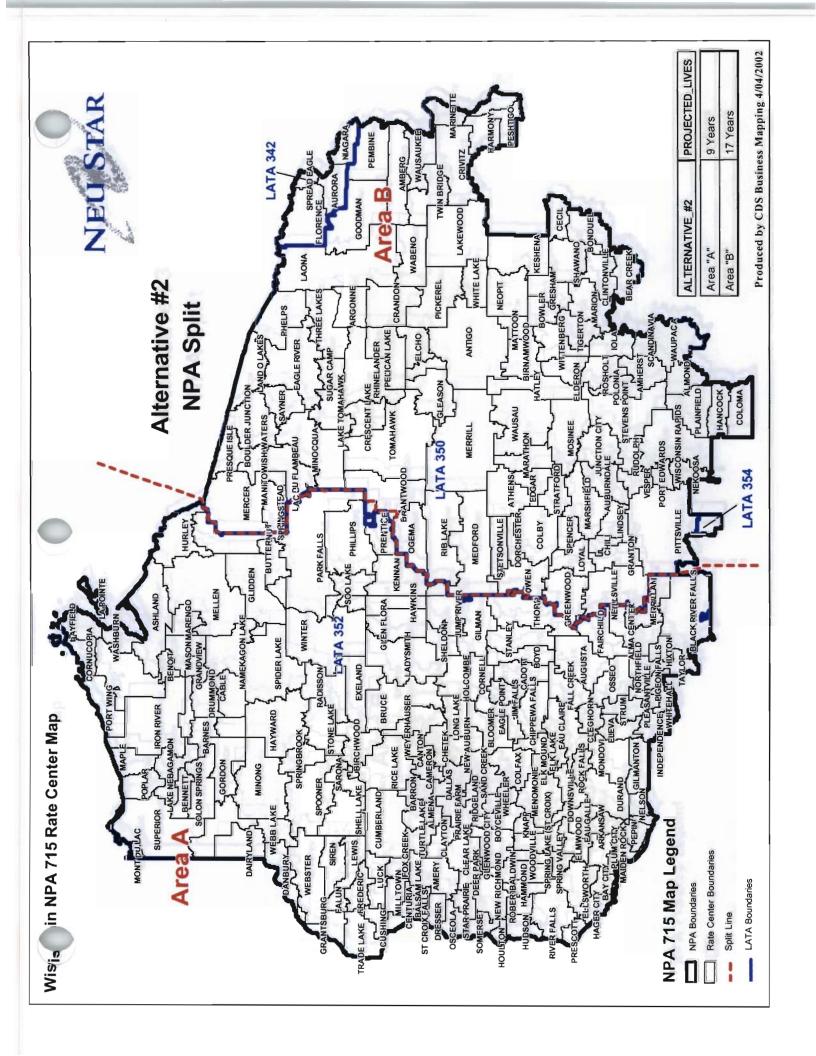
### **WISCONSIN**

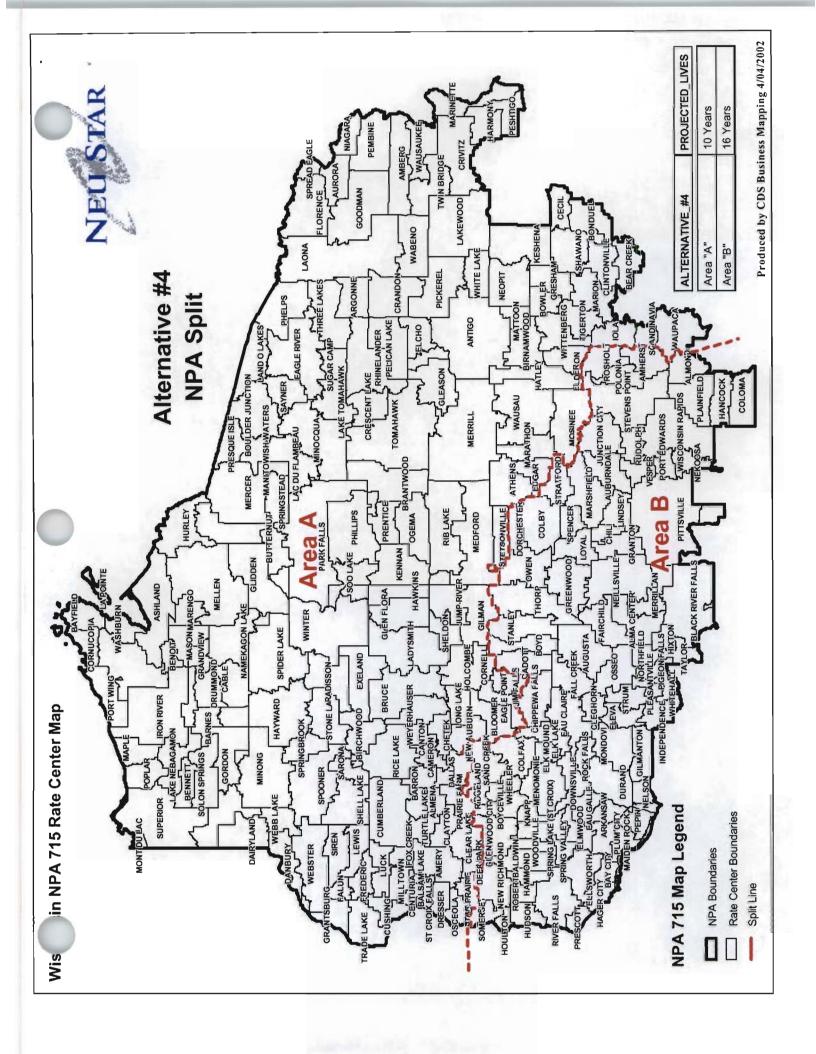
### PROJECTED LIVES OF RELIEF ALTERNATIVES

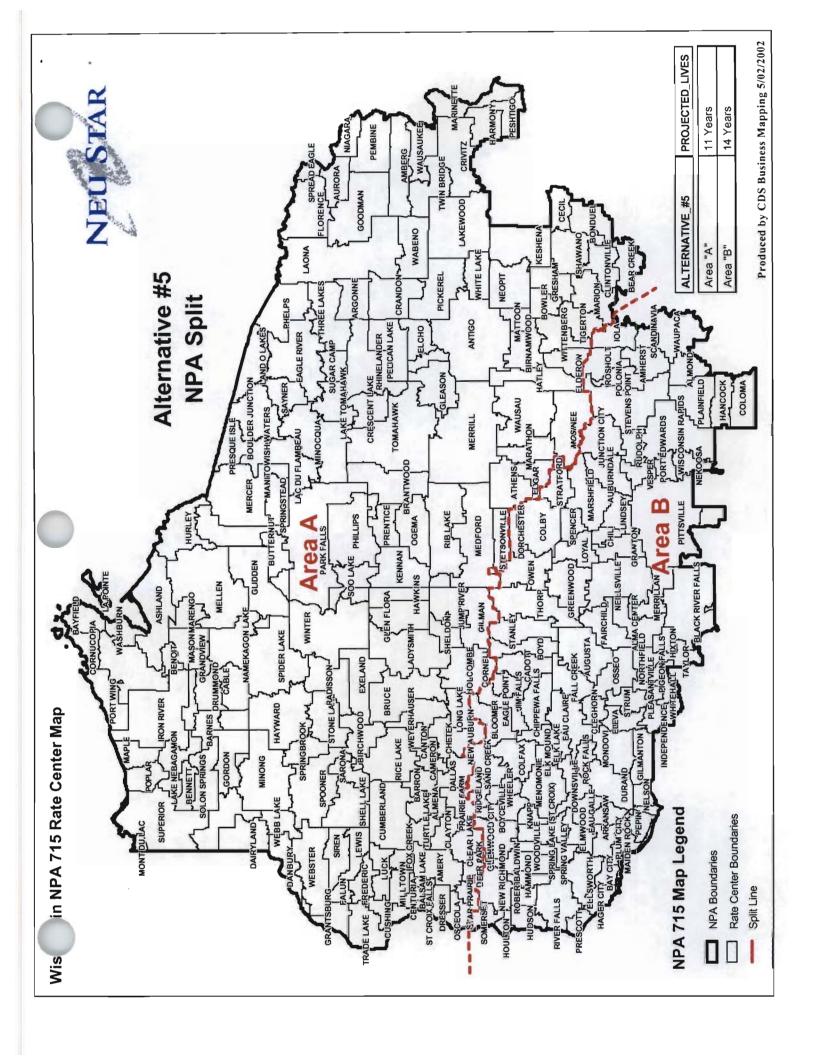
### In Years

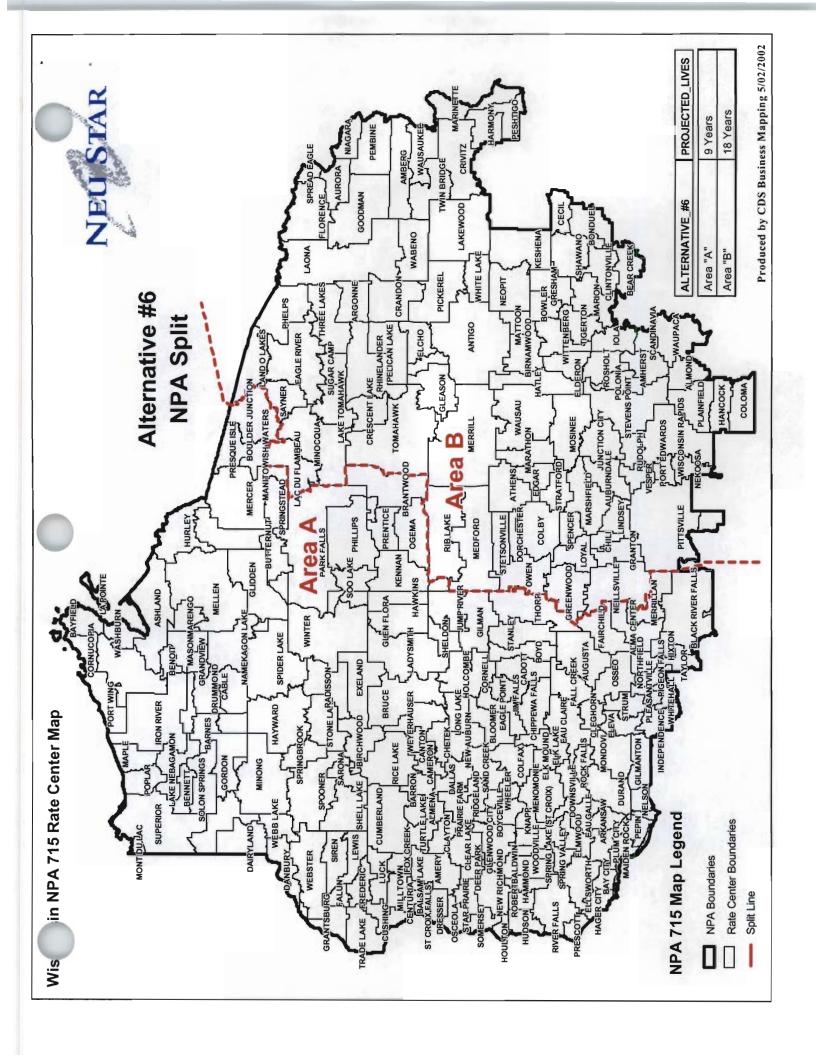
Alternative	Area A		Area B
<b>#1</b>		12	
#2	9		17
#3	10		16
<b>#4</b>	10		16
#5	11		14
#6	9		18

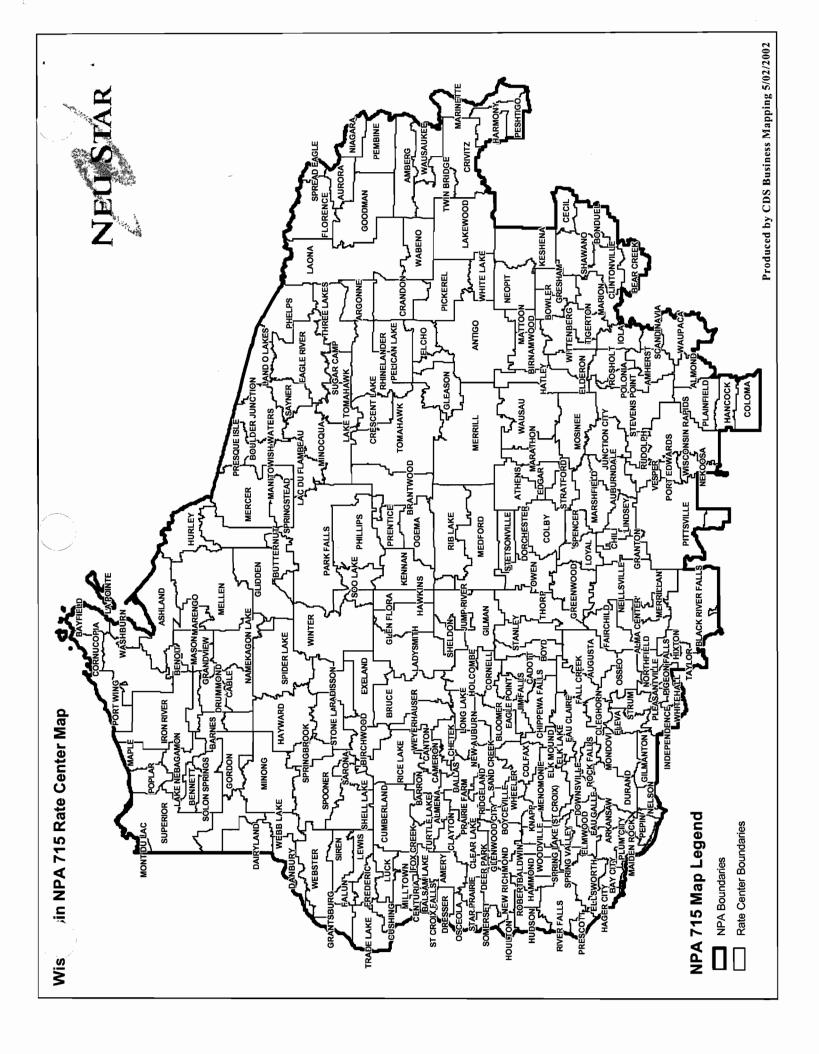












Count of NXX RC FULL NAME	CATEGORY	ICO	PCS	RBOC	WIRELESS	(blank)	Grand Total
ALMA CENTER	OLEU	100	1	RBUC	WIRELESS	(Dialik)	Grand Total
	_	+	_				
ALMENA			1				
ALMOND			1				
AMBERG			1				
AMERY			1				1
AMHERST			1				1
ANTIGO		1	2			2	
ARGONNE			1				1
ARKANSAW			1				1
ASHLAND		1	2			1	- 4
ATHENS			1			1	1
AUBURNDALE			2				
AUGUSTA	<del>-</del>	+	1			_	1
AURORA	+	+	1			_	<del>                                     </del>
	_						
BALDWIN_		4	2			4	
BALSAM LAKE		1	1			1	3
BARNES			1				
BARRON		1	1			1	
BAY CITY			1				1
BAYFIELD		1	1			2	4
BEAR CREEK			1				1
BENNETT			1				1
BENOIT			1				1
BIRCHWOOD			1				-
BIRNAMWOOD			1				-
BLACK RIVER FALLS			1			1	
						1	
BLOOMER			1				
BONDUEL			1				
BOULDER JUNCTION			1				
BOWLER			1				
BOYCEVILLE			1				1
BOYD			1			1	2
BRANTWOOD			1				1
BRUCE			1				1
BUTTERNUT			1			_	-
CABLE			1				-
CADOTT	<u> </u>		1				
CAMERON	· '		1				-
CANTON			1				<u> </u>
CECIL			1	-		4	
CENTURIA		1	1			1	3
CHETEK		1	1		,	1	3
CHILI			1				
CHIPPEWA FALLS					4		4
CLAYTON			1				
CLEAR LAKE			1				
CLEGHORN			1				•
CLINTONVILLE			1			3	
COLBY			1			1	
COLFAX	_	1	1				
COLOMA			1				
CORNELL			1			2	
CORNUCOPIA			1				
CRANDON		+	1				
CRESCENT LAKE		+					
	-		1				
CRIVITZ	+		1				
CUMBERLAND			1			1	
CUSHING			1				•
DAIRYLAND			1				
DALLAS			1				•
DANBURY			1				
DEER PARK			1				-
			1				<u> </u>
DORCHESTER							

DRESSER		1					1
DRUMMOND	,	1					1
DURAND		1			1		2
EAGLE POINT		1					1
EAGLE RIVER	1	2			1		4
EAU CLAIRE	4		2	14	25		45
EAU GALLE		1					1
EDGAR		1					1
ELCHO		1					1
ELDERON		1					1
ELEVA		1					1
ELK LAKE		4					4
		1					1
ELK MOUND		<u> </u>		4			1
ELLSWORTH				1			
ELMWOOD		1					1
EXELAND		1					1
FAIRCHILD		1					1
FALL CREEK		1					1
FALUN		1					1
FLORENCE		1					1
FOX CREEK		1					1
FREDERIC		1			2		3
GILMAN		1			_		1
GILMANTON		1					1
GLEASON		1					1
GLEN FLORA		1					1
GLENWOOD CITY	4						
	1	1					2
GLIDDEN		1					1
GOODMAN		1					1
GORDON		1					1
GRANDVIEW		1					1
GRANTON		1					1
GRANTSBURG		1					1
GREEN BAY					5		5
GREENWOOD		1					1
GRESHAM		1					1
HAGER CITY		1			_		1
HAMMOND		1					1
HANCOCK		1					1
					_		
HARMONY		1					1
HATLEY		1					1
HAWKINS		1			1		2
HAYWARD	1_	2			1		4
HIXTON		1					1
HOLCOMBE		1			1		2
HOULTON				1			1
HUDSON	1			4	1		6
HURLEY		2			3		5
INDEPENDENCE		1					1
IOLA		1					1
IRON RIVER		1					1
JIM FALLS		1			1		
JUMP RIVER	_	1			1		2
JUNCTION CITY		1					1
KENNAN		1					1
KESHENA						_	
		1					1
KNAPP		1		_			1
LA POINTE		1					1
LAC DU FLAMBEAU	1	1					3
LADYSMITH		1			2		3
LAKE NEBAGAMON		1					1
LAKE TOMAHAWK		1					1
LAKEWOOD	_	1					1
LAND O LAKES		1					1
LAONA		1					1
LEWIS		1					1
1110							1

LINDSEY						1
		1				1 1
LONG LAKE		1				
LOYAL		1				1
LUCK		1				1
MAIDEN ROCK		1				 1
MANITOWISH WATERS		1				 1
MAPLE		1				1
MARATHON		1				1
MARENGO		1				1
MARINETTE		2	1		3	 6
MARION		1			•	1
			4		1	
MARSHFIELD		6	1		I	8
MASON		1				1
MATTOON		1				1
MEDFORD		2				2
MELLEN		1				1
MENOMONIE	1		1	3	6	11
MERCER		1				1
MERRILL		2			1	3
MERRILLAN		1			·	1
						1
MILL CREEK		1				
MILLTOWN		1				1
MINOCQUA		2			1	3
MINONG		1				 1
MONDOVI		1				1
MONT DU LAC				1		1
MOSINEE		2				2
NAMEKAGON LAKE		1				1
NEILLSVILLE		1				i
						1
NEKOOSA		1				
NELSON		1				1
NEOPIT		1				1
NEW AUBURN		1				1
NEW RICHMOND		2				2
NIAGARA		1				1
NORTHFIELD		1				1
OGEMA		1				1
OSCEOLA		1			1	2
OSSEO		1			1	2
OWEN						2
	1	1				2
PARK FALLS	1	1				 2
PELICAN LAKE		1				1
PEMBINE		1				1
PEPIN		1				1
PESHTIGO		1			1	2
PHELPS		1				1
PHILLIPS		1				 1
PICKEREL		1				 1
PIGEON FALLS		1				 1
PITTSVILLE		1				- 1
PLAINFIELD	<del> </del>	1				
PLEASANTVILLE	<del> </del>					1
	ļ	1				1
PLUM CITY		1				 1
POLONIA	. 1	1				2
POPLAR		1				1
PORT EDWARDS		2				2
PORT WING		1			_	1
PRAIRIE FARM		1				1
PRENTICE		1				 i
PRESCOTT		1				
PRESQUE ISLE						
		1				1
RADISSON		1				1
RHINELANDER		5	1		7	13
RIB LAKE		1				1
RICE LAKE	2	2	1		3	8
RIDGELAND		1				 1
		'	1			 <u> </u>

Divisio EALLO				-	•		
RIVER FALLS				2	3		5
ROBERTS				1	1		2
ROCK FALLS		1					1
ROSHOLT		1					1
RUDOLPH		1					1
SAND CREEK		1					1
SARONA		1					1
SAYNER		1					1
SCANDINAVIA		1					1
SHAWANO		2	1		1		4
SHELDON		1					<u></u>
SHELL LAKE					1		2
		1			I		
SIREN		1					1
SOLON SPRINGS		1					1
SOMERSET		1					
SOO LAKE		1					1
SPENCER	1	1					2
SPIDER LAKE		1					1
SPOONER		1			1		2
SPREAD EAGLE		1					1
SPRING LAKE (ST CROIX)		1					1
SPRING VALLEY		1					1
SPRINGBROOK		1					1
SPRINGSTEAD		1					1
ST CROIX FALLS		1		, ,	1		2
STANLEY		1			3		4
							4
STAR PRAIRIE		1					1
STETSONVILLE		1		_			1
STEVENS POINT	1		2	7	10		20
STONE LAKE		1					1
STRATFORD	1	1			1		3
STRUM	L	1					1
SUGAR CAMP		1					1
SUPERIOR	. 1	5			1		7
TAYLOR		1					1
THORP		1			1		2
THREE LAKES		1			-		1
TIGERTON		1					1
TOMAHAWK		2			1		3
TRADE LAKE		1			ļ		1
TURTLE LAKE					4		1
		1			1		2
TWIN BRIDGE		1					1
VESPER	ļ	1					1
WABENO		1			1		2
WASHBURN	1	1					2
WAUPACA	1		1	2			6
WAUSAU	3	14	2		11		30
WAUSAUKEE		1					1
WEBB LAKE		1					1
WEBSTER		1					1
WEYERHAUSER		1					1
WHEELER		1					1
WHITE LAKE		1					1
WHITEHALL		1					1
WINTER		1					1
WISCONSIN RAPIDS		6	1		2		9
WITTENBERG		1	· · · · · ·				1
WOODVILLE	<del>                                     </del>	1			_	-	1
	I	1					1
(blook)	1	I					
(blank) Grand Total	32	293	14	40	130		509

# 715 NPA (Wisconsin) Code Holders<sup>1</sup> and Other Industry Members Support Statements

<sup>&</sup>lt;sup>1</sup> Hager Telecom indicated on their reservation form that their preference is Alternative #2

BOX 164, 110 N. SECOND AVENUE

LLAS. W1 54733

TON: :715.837.1011

kir:1.800.924.3405

X:715.837-1196



T-587 P.01

F-940

CTC WIRELUSS

CTC TELCOM

CTC CABLE

CTC NET

COMMUNICATING SOLUTIONS. LES WHAT WE DO.

April 23, 2002

Pamela Kenworthy NPA Relief Planner

Per the April 23 conference call on Plan Relief for the 715 Area Code, it was requested to submit recommendations to you on the four proposed alternatives that were discussed. Our company, Chibardun Telephone / CTC Telcom would have issues with Alternative # Two of our remote exchanges Ridgeland 715-949, and Sand Creek 715-658 would be split from our Dallas 715-837 Host. We would request that if the Alternative # 4 were considered, that Host/Remote switching is factored into the boundary lines. Our Host/Remote Exchange NPA/NXXs are: Dallas 715-837; Chetek 715-925; Cameron 715-458, Rice Lake 715-434; Almena 715-357; Barron 715-637; Prairie Farm 715-455; Ridgeland 715-949; and Sand Creek 715-658.

I have attached a map that outlines our Host/Remote network. I also have marked the 7 digit EAS/ECC dialing plan currently in use, basically one additional layer of exchanges around our network, indicated by 'dash' lines on the attached map.

Thank you,

Doug Kurschner

Central office Supervisor

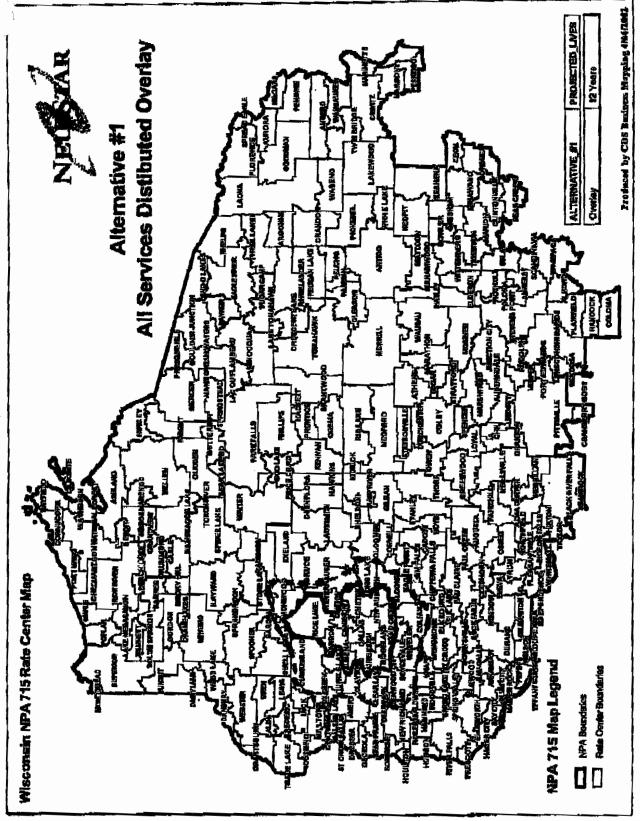
And Kul

Chibardun Telephone/CTC Telcom

110 N 2nd Ave - P.O. Box 164

Dallas, WI 54733

From-KENWORTHY APŘ 15. 2002 9:47PM NANPA



West Wisconsin Telcom Cooperative, Inc. P.O. Box 115 E4528 Cty Rd. C Downsville, WI 54735 (715)664-8311 • (715)664-9982 FAX

To:	Pamela Kenworthy		Fax:	973/267-7921			
From:	Tom Davey		Date:	4/24/2002			
Re:	NPA 715 Code Relief Planning		Pages:	3			
cc:	Randy Siler						
□ Urge	nt 🖾 For Review	☐ Pleas	e Comment	☐ Please Reply	☐ Please Recycle		

#### The state of the s

First, I would like to tell you how valuable the short Pre-IPD conference call on NPA 715 was yesterday. I think it save all of us missived an opportunity to begin thinking about the work sheed of us and to throw our some intest and concerns before we get into the larger and more formal forum in June.

The concern raised by Centrey Tell regarding splitting a remote rate center from its host serving office is a raingione and is also very important to West Wisconsin Telcom Cooperative. We also have an extensive host remote her work and feel this needs to be considered when looking at code relief in the 715 NPA. To her you put his mot the prospective splitting plans I have attached a list of rate centers for our host/remote network and a copy of the map showing their locations.

Secondly, we are an Access Tandem office in the 715 area and provide tandem trunking for End Offices in the southwest quarter of the NPA. We have some concern about placing End Offices that are homed to our Access Tandem into a different NPA. Although this can be accommodated with new translations in our switching equipment, it presents a higher level of effort to prepare for the split than other plans. So that you can consider the impact of the different plans on our network I have also listed the End Offices homing on our Access Tandem in the attached list and shown them on the map.

Of the plans presented so far in the process, we support plan #2 as the best option for our simution. It draws the new LATA boundaries along the existing LATA 350/352 lines which are already separated in the translations database and would require the least work on our part and least impact on our customers.

If you have any questions or comments on this information please call me at 715/231-0504 or e-mail me at <a href="mailto:theta:red">theta: theta:theta

Tom Davey

# West Wisconsin Telcom Cooperative, Inc.

Host & Access Tandem Rate Center:

Elk Lake

Remote Rate Centers hosted by West Wisconsin Telcom Cooperative:

Downsville

Eau Galle

Rock Falls

Spring Lake

Menard

Spring Valley

Clear Lake

Menomonie (for 24-7 Telcom, Inc. [CLEC])

End Office Rate Centers using West Wisconsin Telcom Cooperative's Access Tandem:

Strum

Eleva

Pleasantville

**Pigeon Falls** 

Northfield

Independence

Durand

Nelson

Gilmanton

Arkansaw

Grantsburg

Falun

Trade Lake

Siren

Luck

Cushing

Milltown

Fox Creek

Balsam Lake (for Lakeland Telecom [CLEC])

Centuria (for Lakeland Telecom [CLEC])

Weyerhaueser

Eleland

Radisson

## Kenworthy, Pamela

om:

Trummer, Glori [glori.trummer@tdstelecom.com]

Sent: To: Subject: Tuesday, April 23, 2002 4:53 PM pamela.kenworthy@neustar.biz' Exhaustion 715 NPA Wisconsin



Trummer, Glori.vcf

Pamela,

TDS Telecom has a number of exchanges that could be involved in the overlay or split of the 715 NPA. It is our opinion that alternative #2 splitting lata 350/352 is the best choice.

We understand that this may not be the choice for all, but alternative #2 best fits our needs.

Thanks Glori

Glori Trummer Network Services Translations Specialists II-NPANXX Administrator 608 664-4212 <<Trummer, Glori.vcf>>

## Kenworthy, Pamela

rom:

Colaco, Frank

Sent:

Monday, April 29, 2002 3:52 PM

To: Cc: 'Dave Carter' Kenworthy, Pamela

Subject:

RE: relief in Numbering Plan Area 715

Thanks very much for your feedback concerning NANPA's relief alternatives for the 715 NPA in Wisconsin. Your input is important to us, however the actual decision making will take place during the relief meeting scheduled for June 4, 2002. Since it is the industry participants at that meeting who will decide the appropriate relief alternative, I would encourage you to participate in the meeting to make your opinion heard. In the meantime, please feel free to contact me if you have any questions or require additional information regarding the NPA relief planning process. Thanks again,

Frank

----Original Message----

From: Dave Carter [mailto:dcarter@cheqtel.com]

Sent: Monday, April 29, 2002 3:36 PM

To: 'Frank.colaco@neustar.biz'

Subject: relief in Numbering Plan Area 715

### Frank,

The following are comments from my staff in regards to the 715 area code relief.

from a switching standpoint alternative #2 makes the most sense as this split or border already exists between latas 350 & 352 and would be fairly easy to implement. This option would actually clean up some translations that have to be done now for the (2) 715 latas 352 (ours) & 350 (east Wi) as 350 is interstate and takes 6 digit sampling. This would drop that to 3 digit sampling if it were a different Area code. I think we all agree area code overlays are imminent but the longer we can hold off until soft switching and packet networks are in place and it can be deployed nationwide might save us from doing it today and redoing with future platforms.

From a customer's standpoint, especially the older generation, the less impact would be a overlay for cellular and paging customers. This would include migrating all existing cellular and pager customers to the new area code. Since celluar and paging users are primary younger and more technology savy this would be easier than making older people change to something new. Also, it would have less impact on businesses since most cellular and paging numbers are not advertised.

Dave Carter General Manager Chequamegon Telephone Cooperative P.O. Box 67 43570 Kavanaugh Road Cable, WI 54821 dcarter@cheqtel.com DID: 715-798-7147

Main Office: 715-799-3303

Fax: 715-798-3044